

1 ROBERT W. FREEMAN
2 Nevada Bar No. 3062
3 GREGORY S. BEAN
4 Nevada Bar No. 12694
5 LEWIS BRISBOIS BISGAARD & SMITH LLP
6 6385 S. Rainbow Boulevard, Suite 600
7 Las Vegas, Nevada 89118
8 702.893.3383
9 Fax: 702.893.3789
10 Attorneys for Defendants
11 North Las Vegas Police Department,
12 City of North Las Vegas, Chief Joseph Chronister

13
14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 EDDIE WORMWOOD,
17 Plaintiff,
18 vs.
19 NORTH LAS VEGAS POLICE
20 DEPARTMENT a political subdivision of the
21 STATE OF NEVADA; CITY OF NORTH
22 LAS VEGAS, FORMER CHIEF OF NORTH
LAS VEGAS POLICE DEPARTMENT
JOSEPH CHRONISTER (in his individual
capacity and official capacity as Chief of North
Las Vegas Police Department); DETECTIVE
DAVE MOLNAR (individually and in his
capacity as a police officer employed by the
City of North Las Vegas Police Department);
DEPUTY DISTRICT ATTORNEY JAMES R.
SWEETEN (in his individual capacity);
SENIOR INVESTIGATOR CARRIE MEADS
(in her individual capacity); DOE OFFICERS
1 through 10 (in their individual and official
capacities), inclusive, and JOHN DOES 1-10,
inclusive,
Defendants.

CASE NO. 2:15-cv-1438-GMN-GWF

**STIPULATION AND ORDER TO
EXTEND THE TIME FOR THE PARTIES
TO FILE OPPOSITIONS TO MOTION TO
DISMISS**

(First Request)

COMES NOW, Plaintiff and Defendant, by and through their counsel of record, and pursuant to Local Rule 6-1, the parties hereby stipulate, agree, and make joint application to extend the time within which the plaintiff may file his opposition to the pending motion to dismiss [13]. Pursuant to Local Rule 7-2(b), the oppositions are currently due on September 25, 2015.

1 This extension is based on the following:

Because of the complexity of the Plaintiff's claims and the issues raised by the Defendants in their Motion to Dismiss, Plaintiff's Counsel needs additional time to prepare the response to defendants motion to dismiss[30].

5 This extension is made in good faith and not for purposes of delay.

6 Based upon the foregoing, the parties request that this Court order the time for the parties to file
7 their oppositions to the respective motions for summary judgment be extended fourteen days,
8 pursuant to which said oppositions shall be filed on or before October 9, 2015.

DATED this 25 day of September, 2015.

DATED this 25 day of September, 2015.

LEWIS BRISBOIS BISGAARD SMITH LLP

JUSTICE FORCE LAW GROUP

Robert W. Freeman, Esq.
Nevada Bar No. 3062
6385 S. Rainbow Blvd., #600
Las Vegas, Nevada 89118
Attorneys for Defendant

Zarinah J. Muhammad, Esq.
Nevada Bar No. 12830
6278 Ruby Kinglet
Las Vegas, Nevada 89148
Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

DATED this 25th day of September, 2015.

~~Gloria M. Navarro, Chief Judge
United States District Court~~